

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

FILED  
2006 APR 24 P 4:59  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
SAN ANTONIO

**TRAVIS CO. J.V.,  
ROGER HILL, SR. and  
CHRISTOPHER HILL**

**Plaintiffs,**

**V.**

**CASE NO. 06-CV-146**

**HENNESSEE GROUP, L.L.C.,  
ELIZABETH LEE HENNESSEE  
and CHARLES J. GRADANTE**

## Defendants.

## SCHEDULING RECOMMENDATIONS

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COME Plaintiffs Travis Co. J.V., Roger Hill, Sr., and Christopher Hill (collectively, “Plaintiffs”), and pursuant to the Court’s February 23, 2006, “Order For Scheduling Recommendations and Advisory Concerning Assignment of Magistrate Judge,” Plaintiffs file these Scheduling Recommendations.

1. A report on alternative dispute resolution in compliance with Local Rule CV-88 shall be filed by June 15, 2006.
2. The parties asserting claims for relief shall submit a written offer of settlement to opposing parties by June 15, 2006, and each opposing party shall respond, in writing, by June 29, 2006.
3. The parties shall file all motions to amend or supplement pleadings or to join additional parties by October 2, 2006.

4. All parties asserting claims for relief shall file their designation of potential witnesses, testifying experts, and proposed exhibits, and shall serve on all parties, but not file the materials required by FED. R. CIV. P. 26(a)(2)(B) by August 18, 2006. Parties resisting claims for relief shall file their designation of potential witnesses, testifying experts, and proposed exhibits, and shall serve on all parties, but not file the materials required by FED. R. CIV. P. 26(a)(2)(B) by September 29, 2006. All designations of rebuttal experts shall be designated within 15 days of receipt of the report of the opposing expert.

5. An objection to the reliability of an expert's proposed testimony under Federal Rule of Evidence 702 shall be made by motion, specifically stating the basis for the objection and identifying the objectionable testimony, by December 22, 2006.

6. The parties shall complete all discovery on or before November 17, 2006. Counsel may by agreement continue discovery beyond the deadline, but there will be no intervention by the Court except in extraordinary circumstances, and no trials setting will be vacated because of information obtained in post-deadline discovery.

7. All dispositive motions shall be filed no later than December 22, 2006. Responses to dispositive motions shall be due on or before January 12, 2007. Any reply brief shall be due within the standard 10-day period. Dispositive motions as defined in Local rule CV-7(h) and responses to dispositive motions shall be limited to 30 pages in length.


8. The trial date will be determined at a later date by the Court. The parties shall consult Local rule CV-16(e) regarding matters to be filed in advance of trial. At the time the trial date is set, the Court will also set the deadline for the filing of matters in advance of trial.

9. Counsel for all of the parties who have appeared in the action conferred concerning

the contents of the proposed scheduling order on April 21, 2006 and the parties did not agree as to its contents. Specifically, Defendants believe a motion to stay is appropriate and told the undersigned they intended to file that motion today.

Respectfully submitted,

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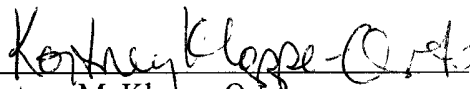
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been sent via certified mail, return receipt requested, to the following counsel of record on this the 24th day of April, 2006:

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